

EXHIBIT 17

Angela Russell, et al.  
v.  
Management & Training Corporation, et al.

Angela Russell  
June 13, 2023

***Brown Court Reporting & Litigation Support***  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

ANGELA RUSSELL, AS ADMINISTRATRIX  
OF THE ESTATE OF JEREMY T. RUSSELL  
AND ON BEHALF OF THE WRONGFUL DEATH  
BENEFICIARIES OF JEREMY T. RUSSELL PLAINTIFF

vs. CAUSE NO. 3:22-CV-294-HTW-LGI

MANAGEMENT & TRAINING CORPORATION;  
JOHN AND JANE DOE CORRECTIONAL OFFICERS;  
VITALCORE HEALTH STRATEGIES, LLC; EVELYN DUNN;  
STACEY KITCHENS; WILLIAM BRAZIER, AND  
JOHN AND JANE DOE MEDICAL PROVIDERS DEFENDANTS

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DEPOSITION OF ANGELA DENISE RUSSELL

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APPEARANCES NOTED HEREIN

TAKEN AT THE INSTANCE OF: DEFENDANTS  
LOCATION: ADAMS & REESE  
1018 HIGHLAND COLONY PARK, SUITE 800  
RIDGELAND, MISSISSIPPI  
DATE: TUESDAY, JUNE 13, 2023  
TIME: 10:00 A.M.

REPORTED BY: KELLYE S. SHOWS, CSR #1290

## A P P E A R A N C E S

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CORPORATION; JOHN AND JANE DOE  
CORRECTIONAL OFFICERS

1 to the hospital they didn't find any drugs in him.  
2 Now, I don't know if it's true or not, but that's  
3 what they said.

4 Q. Do you know who on the zone had illegal  
5 narcotics?

6 A. No. They didn't tell me that.

7 Q. Okay. Are you contending that MTC gave  
8 Jeremy Russell access to the illegal narcotics?

9 MR. BRAGG: Objection. You can answer.

10 A. No. No, I'm not contending that. I don't  
11 -- no, I don't think an officer did it.

12 BY MR. YOUNG:

13 Q. Okay. Who do you think gave him access  
14 to illegal narcotics?

15 MR. BRAGG: Objection. You can answer.

16 A. Well, an offender. Or I don't know or  
17 somebody who has access to bring them in.

18 BY MR. YOUNG:

19 Q. It could have been a visitor. Right?

20 MR. BRAGG: Objection. Can I get a  
21 continuing objection to she doesn't have personal  
22 knowledge about this?

23 MR. YOUNG: Sure.

24 MR. BRAGG: Okay.

25 A. Yeah. Well, I don't have -- that's right.